

Claims 16-20, 24, 25 , 80, and 86 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Begin et al., in view of Miyachi et al., Nakayama et al., and Kawasaki et al., further in view of Codama et al., of record, further in view of Presley (U.S. Patent No. 4,475,027), further in view of Kawachi et al., the newly cited article entitled “Large-Area Process for Fabrication of Poly-Si Thin Film Transistors Using Bucket Ion Source and XeCl Excimer Laser Annealing.”

Claims 56-61, 81 and 87 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Begin et al., in view of Miyachi et al., Nakayama et al., and Kawasaki et al., further in view of Codama et al., all of record, further in view of Hashizume (JP 03-286518), further in view of Kawachi et al., the newly cited article entitled “Large-Area Process for Fabrication of Poly-Si Thin Film Transistors Using Bucket Ion Source and XeCl Excimer Laser Annealing.”

Claims 74-79, 82-85, and 89-91 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Begin et al., in view of Miyachi et al., Nakayama et al., and Kawasaki et al., further in view of Codama et al., all of record, further in view of Kawachi et al., the newly cited article entitled “Large-Area Process for Fabrication of Poly-Si Thin Film Transistors Using Bucket Ion Source and XeCl Excimer Laser Annealing.”

Applicants respectfully submit that the reference to Kawachi teaches doping a dopant and laser activating the doped dopant. However, the reference to Kawachi does not disclose, suggest, or motivate conducting the laser activation in a chamber. As the reference to Kawachi does not disclose, suggest, or motivate conducting the laser activation in a chamber, there is also no

suggestion or motivation provided by any of the cited prior art references to combine the doping chamber and a laser irradiation chamber in a multi-chambered apparatus to make Applicants' presently claimed invention.

With respect to the Codama et al. reference, Applicants respectfully submit that the reference teaches a laser activation. However, the reference does not suggest conducting the laser activation in a chamber. As Codama et al. do not disclose, suggest, or motivate conducting the laser activation in a chamber, there is also no disclosure, suggestion, or motivation provided by any of the cited prior art references to combine a doping chamber and a laser irradiation chamber in a multi-chambered apparatus to make Applicants' presently claimed invention.

Applicants respectfully submit that in the presently claimed invention doping is conducted for a thin film transistor. The reference to Miyachi, however, teaches a solar cell rather than a thin film transistor. There is no suggestion or motivation provided by any of the cited prior art references to combine the laser dehalogenation-hydrogenation chamber of Miyachi and a doping chamber in a multi-chambered apparatus to make Applicants' presently claimed invention.

It is well-established that, in order to show obviousness, all limitations in the claim must be taught or suggested by the prior art. In Re Boyka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); MPEP § 2143.03. It is error to ignore specific limitations distinguishing over the references. In Re Boe, 184 U.S.P.Q. 38, 505 F.2d 1297 (C.C.P.A. 1974); In Re Saether, 181 U.S.P.Q. 36, 492 F.2d 849 (C.C.P.A. 1974); In Re Glass, 176 U.S.P.Q. 489, 472 F.2d 1388 (C.C.P.A. 1973).

Citing references which merely indicate that isolated elements and/or features recited in the claims are known is not a sufficient basis for concluding that the combination of claimed elements would have been obvious. Ex parte Hiyamizu 10 USPQ2d 1393 (BPAI 1988).

Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. In re Geiger 815 F2d 686 (Fed. Cir. 1987), 2 USPQ2d 1276.

Applicants note that the burden of establishing a prima facie case of obviousness under § 103 lies with the Patent Office. In re Fine, 5 USPQ2d 1596 (Fed. Cir. 1988). To establish a prima facie case of obviousness, there must be (1) some suggestion or motivation (either in the references themselves or in the knowledge generally available to one of ordinary skill in the art) to modify the reference or to combine reference teachings to achieve the claimed invention and (2) the prior art must teach or suggest all the claim limitations. MPEP § 2143. Also, simply because the references could be does not mean that they should be. MPEP § 2143.01, citing In re Mills, 16 USPQ2d 1430 (Fed. Cir. 1990).

As set forth in the arguments above, the Office has not met both requirements 1 and 2, and a prima facie case of obviousness has not been established. Accordingly, the § 103 rejections of claims 16-20, 24, 25, 56-61, and 74-91 should be reconsidered and withdrawn.

### **CONCLUSION**

Having responded to all rejections set forth in the outstanding non-final Office Action, it is submitted that claims 16-20, 24, 25, 56-61 and 74-91 are now in condition for allowance. An early and favorable Notice of Allowance is respectfully solicited. In the event that the Primary